

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF INTER-COUNTY ENERGY	)	
COOPERATIVE CORPORATION, KENTUCKY	)	
POWER COMPANY, KENTUCKY UTILITIES	)	
COMPANY, LOUISVILLE GAS AND ELECTRIC	)	
COMPANY, OWEN ELECTRIC COOPERATIVE,	)	CASE NO.
INC., SHELBY ENERGY COOPERATIVE, INC. AND	)	2005-00276
THE UNION LIGHT HEAT AND POWER COMPANY	)	
FOR APPROVAL OF A PILOT METER TESTING	)	
PLAN PURSUANT TO 807 KAR 5:041, SECTIONS	)	
13, 15, 16, 17 AND 22	)	

FIRST DATA REQUEST OF COMMISSION STAFF

Inter-County Energy Cooperative Corporation, Kentucky Power Company, Kentucky Utilities Company, Louisville Gas and Electric Company, Owen Electric Cooperative, Inc., Shelby Energy Cooperative, Inc. and The Union Light Heat and Power Company (“Companies”) are requested, pursuant to 807 KAR 5:001, to file with the Commission the original and seven copies of the following information, with a copy to all parties of record. The information requested herein is due on or before September 28, 2005. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been

previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request.

1. What impact has the Sample Meter Testing Plan had on the accuracy of meters in the Companies' systems?

2. Explain the advantages and disadvantages realized by the Pilot Meter Testing Plan compared to the previous meter testing plan.

3. Refer to page 3, item 6 of the application. The Companies state, "A failed meter lot will be further subdivided, if appropriate." Explain what "appropriate" means in subdividing a homogeneous group.

4, Refer to page 3, item 7 of the application. Have manufacturers notified the Companies about problems in some groups during the Sample Meter Testing Plan period? Explain.

5. Refer to page 10 of the proposed 2006 Sample Meter Testing Plan. The Companies state, "When a control group is classified as 'failed' and a poor performing sub-group can be identified for separation from the original control group...." Explain how the Companies will identify the poor performing subgroup.

6. Refer to page 10 of the proposed 2006 Sample Meter Testing Plan. The Companies state, "The utility will make every reasonable effort to remove the entire control group of meters from service within 18 months." Explain the circumstances

where the Companies do not remove the failed group within 18 months and how the Companies will comply with the Sample Meter Testing Plan.



---

Beth O'Donnell  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602

Dated: September 15, 2005

cc: Parties of Record